

EXHIBIT 25

SUPPLEMENTAL DECLARATION OF RANDANE WILLIAMS

I, Randane Williams, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I recently learned that someone in a different unit has COVID-19 and I am worried.
2. Around March, they moved everybody from unit 10 – where I was – to unit 9. It was a lot of us. The whole unit was full. We have four-man cells and two-man cells. Right now, all the four-man cells are packed. I have been housed in the same two-man cell since being moved.
3. People are still being transferred to our unit. Since moving to unit 9, I have seen at least four inmates move to our unit. Just last week, one inmate was moved into our unit.
4. In terms of the staff, they have shifts of different people every day. It's common for me to see completely new staff members I have not seen before. Yesterday they had someone completely new. Staff members only have masks on, they do not wear gloves and they do not have hand sanitizer in the unit.
5. They give us each six small bars of soap every Thursday and I have stopped getting shampoo. If I run out of soap, they won't give you more. I have run out of soap and have asked for more but they told me I had to wait till Thursday. They do not provide disinfectant or hand sanitizer.
6. To use the restroom, I usually have to use the toilet in my cell. Otherwise, there is one toilet outside of my cell for the whole unit. We do not get any supplies to clean the toilet. The only people who get cleaning supplies are the cleaning workers in the unit. They only clean the showers and that one communal toilet. I have been using shampoo that I bought in the commissary to clean my own toilet. The shower area is like a communal place with thirteen shower heads. Inmate workers clean the bathroom and showers only once every other day.
7. Two days ago, they provided us with one new mask each after having had the same mask for about three or four weeks. It's the same type of mask. They did not provide information on when they will give us new masks. They did not tell us about whether we need to clean the masks or how to clean it. After you put them on for hours they get sweaty and you can't really put them back on your face.
8. They do not regularly clean the common areas and things like phones, the seats we sit on and the commissary area. Maybe every 12 hours. The phone I'm using right now, I don't know if they have cleaned it.
9. We get food in a hard tray with four different spots for food. The tray is not covered in plastic. I don't know if it's disinfected or cleaned. They don't tell us and I don't work in the kitchen.

10. All the information I get from COVID-19 is from the news. They have not come here to speak with us about it and made no announcement about COVID-19. I asked a CO about COVID-19 a few weeks back and was told it's not in Alabama. We heard rumors that the unit downstairs has one COVID-19 positive case. Someone asked the staff and they confirmed.
11. This declaration was read to me in English, and I swear it is true. I have authorized Khaled Alrabe, National Immigration Project of the National Lawyers Guild, to sign for me.

Executed this 6th day of May 2020.

s/Khaled Alrabe
Randane Williams